

167127



BellSouth Telecommunications, Inc.

Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

March 25, 2003

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region  
InterLATA Services Pursuant to Section 271 of the Telecommunications  
Act of 1996 (Six-Month Performance)  
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed please find for filing an original and fifteen copies of a Motion by BellSouth Telecommunications Inc. for a Paper Proceeding in the above-captioned matter. By copy of this letter, I am serving all parties of record with a copy of this document as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Patrick W. Turner".

Patrick W. Turner

PWT/nml

Enclosure

PC Doc # 485232

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2001-209-C

IN RE:

Application of BellSouth Telecommunications, Inc. )  
To Provide In-Region InterLATA Services )  
Pursuant to Section 271 of the Telecommunications )  
Act of 1996 – Six-Month Review )

**MOTION BY BELL SOUTH TELECOMMUNICATIONS INC. FOR A PAPER  
PROCEEDING.**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests the Public Service Commission of South Carolina ("Commission") to cancel the hearing in this docket and render a decision on the basis of the paper record as it currently exists.

The grounds for this request are that on March 5, 2003, BellSouth pre-filed the direct testimony and exhibits of its witnesses in accordance with the Order Establishing Pre-Filing Deadlines ("Order") that was entered in this docket. On March 19, 2003, the Commission Staff pre-filed the direct testimony and exhibits of its witnesses in accordance with the Order. No other person or entity has pre-filed testimony or exhibits in this docket. The Order allows BellSouth to pre-file rebuttal testimony and exhibits on or before March 26, 2003, and it allows the Commission Staff and/or other parties to address any such rebuttal by pre-filing surrebuttal testimony and exhibits on or before March 28, 2003. BellSouth will not be filing any rebuttal testimony or exhibits, which means that no surrebuttal testimony or exhibits will be pre-filed.

Unless any other party to this docket objects, therefore, BellSouth requests that the Commission cancel the hearing in this docket, allow the parties to submit briefs on

the basis of the record as it currently exists, and render its decision on the basis of this record. Because the sheer number of parties of record made it impractical for BellSouth to contact each party individually to determine whether they objection to this approach, BellSouth requests that any party that objects to this approach file a copy of such objection and serve it upon all parties of record as soon as possible.

This 25th day of March, 2003.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Patrick Turner", written over a horizontal line.

Patrick W. Turner  
1600 Williams Street, Suite 5200  
Columbia, South Carolina 29201

J. Phillip Carver  
675 West Peachtree Street, Suite 4300  
Atlanta, Georgia 30375

ATTORNEYS FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA                    )  
  ) CERTIFICATE OF SERVICE  
COUNTY OF RICHLAND                        )

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion For a Paper Proceeding in Docket No. 2001-209-C to be served upon the following this March 25, 2003:

Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(U. S. Mail and Electronic Mail)**

L. Hunter Limbaugh, Esquire  
2725 Devine Street  
Columbia, South Carolina 29205  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of  
South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCImetro Access Transmission Services,  
Inc.)  
**(U. S. Mail and Electronic Mail)**

John F. Beach, Esquire  
John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(Resort Hospitality Services, Inc.,  
NuVox Communications, Inc., AIN and  
Momentum Business Solutions, Inc.)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Michael Henry, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1500  
Post Office Box 944  
Columbia, South Carolina 29202  
(NewSouth Communications Corp., SCCTA  
and SECCA and KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

Genevieve Morelli  
Andrew M. Klein  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043  
(KMC Telecom)  
**(U. S. Mail and Electronic Mail)**

Edward Phillips  
Attorney  
141111 Capital Blvd.  
Wake Forest, NC 27587-5900  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein LLP  
1201 Main Street, Suite 1450  
Columbia, South Carolina 29202  
(US LEC)  
**(U. S. Mail and Electronic Mail)**

William R. Atkinson, Esquire  
3100 Cumberland Circle  
Cumberland Center II  
Atlanta, Georgia 30339-5940  
(Sprint Communications Company L.P.)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director - State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Timothy Barber, Esquire  
Womble, Carlyle, Sandridge & Rice  
3300 One First Union Center  
301 South College  
Suite 3300  
Charlotte, North Carolina 20202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

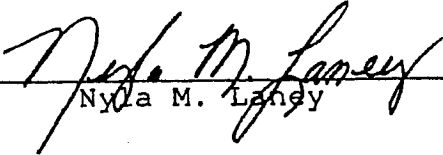
Traci Vanek, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Tami Azorsky, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Michael Hopkins, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

William Prescott, Esquire  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

John A. Doyle, Jr., Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27602  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

  
\_\_\_\_\_  
Nyla M. Laney

PC Docs # 401224